United States District Court Southern Eastfor of Texas FOR SO

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS McALLEN DIVISION

SEP 1 2 2017

David J. Bradley, Clark

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UNITED STATES OF AMERICA	. 9 9		,
v.	99	Criminal No.	M-16-1376-S4
HUGO ALEJANDRO DE HOYOS	§ §		
VANESSA RIOS	§		
ARTURO BAZAN-MARTINEZ, J	IR. §		
JOSE ARMANDO BAZAN	§		
SALVADOR HERNANDEZ	§		
RICHARD LEON CASTILLO	§		
VICTOR MANUEL GONZALEZ,	JR. §		

SEALED SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Count One

From on or about August 26, 2016, to on or about August 27, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

HUGO ALEJANDRO DE HOYOS VANESSA RIOS ARTURO BAZAN-MARTINEZ, JR. and VICTOR MANUEL GONZALEZ, JR.

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

Count Two

From on or about August 27, 2016, to on or about September 3, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE ARMANDO BAZAN

did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Three

On or about August 27, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

SALVADOR HERNANDEZ and RICHARD LEON CASTILLO

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Four

On or about August 27, 2016, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

SALVADOR HERNANDEZ

did knowingly and intentionally possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more, that is, approximately 3 kilograms of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1), and 841(b)(1)(B) and Title

18, United States Code, Section 2.

Count Five

On or about December 1, 2016, in the Southern District of Texas and within the

jurisdiction of the Court, defendant,

RICHARD LEON CASTILLO

did knowingly and willfully make materially false, fictitious, and fraudulent statements and

representations in a matter within the jurisdiction of the executive branch of the Government

of the United States, namely, the United States Drug Enforcement Administration, by stating

to Drug Enforcement Administration Special Agents regarding a seizure of narcotics on

August 27, 2016, that he did not know who transported the narcotics from the location on

Stewart Road to the San Juan Police Department, and did not see the narcotics until they were

transported to the San Juan Police Department, when in truth and in fact, the statements and

representations were false in that he did know who transported the narcotics from the location

on Stewart Road to the San Juan Police Department, and did see the narcotics prior to their

arrival at the San Juan Police Department.

In violation of Title 18, United States Code, Section 1001(a)(2).

A TRUE BILL 1

FOREPERSON

ABE MARTINEZ

ACTING UNITED STATES APTORNEY

ASSISTANT UNITED STATES ATTORNE